

SINGH, SINGH & TRAUBEN, LLP
THOMAS K. RICHARDS (SBN: 310209)
trichards@singhtraubenlaw.com
400 S. Beverly Drive, Suite 240
Beverly Hills, California 90212
Tel: 310.856.9705 | Fax: 888.734.3555

Attorneys for Defendants
TRIWOLF MEDIA, LLC *and*
TANGO MULTI MEDIA PRODUCTIONS, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

COLONIZE MEDIA, INC.,) Case No.: 1:20-cv-01053-DAD-SAB
)
Plaintiff,) STIPULATION TO EXTEND TIME TO
) RESPOND TO INITIAL COMPLAINT BY
v.) NOT MORE THAN 28 DAYS (L.R. 144(a))
)
TATE A. PALMER, TRIWOLF) COMPLAINT FILED: July 29, 2020
MEDIA, LLC, and TANGO MULTI)
MEDIA PRODUCTIONS, LLC,)
)
Defendants.)
)

TO THE HONORABLE COURT:

Plaintiff COLONIZE MEDIA, INC. (“**Plaintiff**”) and defendants TRIWOLF MEDIA, LLC (“**Triwolf**”) and TANGO MULTI MEDIA PRODUCTIONS, LLC (“**Tango**”) (collectively, “**Defendants**”), by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, on July 29, 2020, Plaintiff filed its initial Complaint [DE 01];

WHEREAS, Plaintiff asserts that it effectuated substitute service of the Complaint upon Defendants Triwolf and Tango at their principal place of business;

WHEREAS, Defendants have indicated that neither Defendants nor counsel for Defendants were aware of the existence of this Complaint until October 20, 2020;

WHEREAS, pursuant to Local Rule 144(a), Plaintiff and Defendants stipulate that Defendants’ time to respond to Plaintiff’s initial Complaint shall be extended to up through and including November 19, 2020, a period of time not more than 28 days from the date of this stipulation;

The instant stipulation is brought pursuant to Rule 144(a), which permits the parties to stipulate to extend the time to respond to an initial complaint for a period of time not more than 28 days without prior Court approval.

NOW THEREFORE, IT IS HEREBY STIPULATED and agreed by and between Plaintiff and Defendants Triwolf and Tango, through their attorneys of record, that the deadline for Defendants Triwolf and Tango to respond to the initial Complaint is extended to up through and including **November 19, 2020**.

IN WITNESS WHEREOF, the undersigned have made and entered into this Stipulation as of the date set forth below.

SO STIPULATED.

1 **DATED:** October 22, 2020

Respectfully submitted,

2 **SINGH, SINGH & TRAUBEN, LLP**
3 **THOMAS K. RICHARDS**

4
5 By: /s/ Thomas K. Richards

6 Thomas K. Richards

7 *Attorneys for Defendants*

8 TRIWOLF MEDIA, LLC and TANGO
9 MULTI MEDIA PRODUCTIONS, LLC

10 **DATED:** October 22, 2020

Respectfully submitted,

11 **HEFNER, STARK & MAROIS, LLP**

12
13
14 By: /s/ Thomas P. Griffin, Jr. (as authorized on 10/22/20)

15 Thomas P. Griffin, Jr.

16 *Attorneys for Plaintiff*

17 COLONIZE MEDIA, INC.
18
19
20
21
22
23
24
25
26
27
28